

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

CENTER FOR BIOLOGICAL  
DIVERSITY; SAVE OUR SPRINGS  
ALLIANCE, INC.,

Plaintiffs,

V.

TEXAS DEPARTMENT OF  
TRANSPORTATION; JAMES BASS,  
EXECUTIVE DIRECTOR,

Defendants.



CASE NO. 1:16-CV-876-LY

## STATUS REPORT

In accordance with the Order Granting Motion to Stay Litigation dated December 16, 2016, Plaintiffs Center for Biological Diversity and Save Our Springs Alliance inform the Court of the following:

On March 15, 2017 Defendants informed Plaintiffs that the U.S. Fish and Wildlife Service has not yet responded to the Texas Department of Transportation's request for informal Section 7 consultation under the Endangered Species Act. Defendants also informed Plaintiffs that they anticipate utility relocation to begin on May 1, 2017 with further construction on the MoPac Intersections Improvement Project beginning on September 1.

Plaintiffs have contacted Defendants to determine whether an extension of the present stay would be appropriate. The current stay will expire on March 31, 2017, unless Plaintiffs seek and receive an extension of the stay with the Court.

Respectfully submitted,

/s/ Jennifer L. Loda

JENNIFER L. LODA (CA Bar No. 284889)\*  
Center for Biological Diversity  
1212 Broadway, Suite 800  
Oakland, CA 94612-1810  
Tel: (510) 844-7136  
Fax: (510) 844-7150  
jloda@biologicaldiversity.org

COLLETTE L. ADKINS (MN Bar No. 035059X)\*  
Center for Biological Diversity  
P.O. Box 595  
Circle Pines, MN 55014-0595  
Tel: (651) 955-3821  
Fax: (510) 844-7150  
cadkins@biologicaldiversity.org

KELLY D. DAVIS (Tex. Bar No. 24069578)  
WILLIAM G. BUNCH (Tex. Bar No. 0334520)  
Save Our Springs Alliance  
905 W. Oltorf St., Suite A  
Austin, Texas 78704  
T. (512) 477-2320  
F. (512) 477-6410  
bill@sosalliance.org  
kelly@sosalliance.org

**Attorneys for Plaintiffs**

\*Granted admission *pro hac vice*

**CERTIFICATE OF SERVICE**

I certify that on March 17, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically notify via email all counsel of record.

/s/ Jennifer L. Loda

JENNIFER L. LODA  
ATTORNEY FOR PLAINTIFFS